

KeyPro

Branch ▾



Tools ▾

Products

Services

Administration

System Instructions

What information are you looking for?



Search Tips

EXHIBIT
Appendix B

Services / Wire Transfers

Outgoing Wire Transfers

Revision History

[Accept Cash for Outgoing Wires](#)[Approve Wire Transfer Requests](#)[Consumer International Wire Trans...](#)[Consumer International Wire Trans...](#)[Early Release of Large Wire Trans...](#)[Identify Clients Requesting Wires](#)[Initiate Outgoing \\$5 M for BB/Mid...](#)[Initiate Outgoing Wire Transfers](#)[Initiate Request for Tax Payment ...](#)[Initiate Same-Day Wire Transfers](#)[Not In-Person Outgoing Wire Excep...](#)[Timeframes for Processing Request...](#)

Approving Wire Transfer Requests

This page contains the procedure for branch employees to use when approving a wire transfer request.

Important: Before the Wire Transfer department releases a wire, you must approve the wire request in Quest.

View All

Step-by-Step

Step 1

Review the completed, signed KeyBank Beneficiary Wire Transfer form provided by the Initiator for the following:

- dollar amount
- 7-digit operational cost center number
- send date of the wire
- beneficiary information
- signatures of the client and initiating employee

Step 2

Using Hogan, access the Average Balance History (DDMU 12) screen to compare the 12-month average balance to the current balance to determine if additional due diligence is needed.

Step 3

Using OLDS, perform an Inquiry to verify that no holds, stops or restraints exist that would prevent the account from being debited to pay for the wire.

Step 4

Using Quest, access the Client Profile | Account List panel to view the Open Date of the debiting account to determine if the account is new (open 60 days or less).

Step 5

Has the account been open for 80 days or less?

Important: Leadership (experience leader (EL), market experience leader (MEL), regional experience leader (REL), area retail leader (ARL), or regional retail leader/territory executive (RRL/RTE) must be the approver in Quest.

Yes

- a. Review the situation carefully for red flags ([./Security/Branch/security.htm#identifying](#)) and verify that the funds are available (either cash or drawn on against a KeyBank account in good standing).
- b. Work with leadership (EL, MEL, REL, ARL, or RRL/RTE) to obtain exception approval for initiating a wire transfer for an account that has been open for 80 days or less. Leadership, see the instructions for Approving a Wire Transfer Request for a New Account ([./Admin/Leadership/ApproveExceptions/Branch/WireNewAccount.htm](#)).

Continue to step 6.

No

Using Quest, approve, reassign, or reject the Wire Transfer service request ([./kc/quest/Service/Wire.htm#approving](#)) as appropriate.

Continue to step 6.

Step 6

Did you or leadership reject the Wire Transfer service request?

Yes

Contact the Initiator to notify him/her/them of your decision.

You have completed this procedure.

No

You have completed this procedure.

KeyPro

Branch ▾



Tools ▾

Products

Services

Administration

System Instructions

What information are you looking for?



Search Tips

Services / Wire Transfers

Security

Handle Compromised Confidential I...

Handle Suspicious Wires

Identify Red Flags

Handling a Suspicious Wire

This page contains the procedure for branch employees to use to handle a suspicious wire.

View All

Step-by-Step

Step 1

Contact your supervisor, experience leader (EL), market experience leader (MEL), or retail experie the situation along with any potential red flags (security.htm).

Step 2

Did you decide to process the wire transfer?

Yes

Process the wire transfer.

Continue to step 3.

No

- a. Inform the client that you cannot process the wire transfer.
- b. If you believe fraud is involved, call the Fraud & Disputes Hotline (/eman/kc/kccontactile/flist.htm#FraudHotline) to report the situation.

Continue to step 3.

Step 3

Do you suspect the client may be involved in money laundering activity?

Yes

Complete the Suspicious Activity Reporting Form (keyc.00356) (<https://forma.office.com/Pid=5a2KJEEc3kGOoxle4rSBswW4hrpnJyVPIBv8RC5YbpUMUhaWUE1WDJMMVpVRzFt>) instructions, see Handling Suspicious Activity under the Bank Secrecy Act (/Admin/Compliance/BSA/Branch/suspicious.htm).

You have completed this procedure.

No

You have completed this procedure.

Key Bank 233-445-5670

4722

KeyPro

Branch ▾

Q Tools ▾

Products

Services

Administration

System Instructions

What information are you looking for?

Q

Search Tips

Services / Wire Transfers

Outgoing Wire Transfers

Re

Accept Cash for Outgoing Wires

Approve Wire Transfer Requests

Consumer International Wire Trans...

Consumer International Wire Trans...

Early Release of Large Wire Trans...

Identify Clients Requesting Wires

Initiate Outgoing \$5 M for BB/Mid...

Initiate Outgoing Wire Transfers

Initiate Request for Tax Payment ...

Initiate Same-Day Wire Transfers

Not In-Person Outgoing Wire Excep...

Timeframes for Processing Request...

Identifying Clients Who Request Outgoing Wire Tran

This page contains the procedure for branch employees to use when identifying clients who request transfers.

Note: Branch employees with the proper authority can process outgoing wire transfers for retail clients.

View All

Step-by-Step

Step 1

Determine your first step.

If the client is making the request

In-person at the branch

Not in-person by phone, fax, email, or mail

Instructions

Continue to step 3.

Continue to step 2.

Step 2

Determine your next step.

If the client is making the request

Retail client submitting the request via email

Instructions

Respond to the person's email using the following script:

To protect both KeyBank and our clients from potential losses due to fraud activity, KeyBank's branch network does not accept wire transfer request. Instead, please visit your local KeyBank branch to request a wire transfer.

You have completed this procedure.

A Retail client

- a. Inform the client that Key does not accept not-in-person wire transfer requests.
- b. Ask the client to visit a branch to request the wire transfer.

Important: If the client cannot visit a local branch, does not have a Wire Service Agreement set up, has stated that not sending the wire will create hardship, and you feel an exception should be made, contact your regional experience leader (REL) or market experience leader (MEL) to review situation.

You have completed this procedure.

A Private Bank, Business Banking, or Middle Market client

Refer the request to the owning relationship manager (RM).

Note: A centralized wire transfer group handles Private Bank, Middle Market Business Banking clients. Referring a not in-person request to the owning RM that we fully authenticate the client and handle wire transfers according to the line of business procedures.

You have completed this procedure.

Step 3

Following KeyCorp's Know Your Customer procedure and the identification policies for wire transfers, the requestor is an established client and an authorized person on the debiting account for the wire transfer.

Step 4

Determine if the authorized person on the debiting account for the wire has one of the following customer-to-account (CUAC) relationship codes:

- BKT (bankruptcy)
- COF (co-owner first)
- COO (co-owner other)
- CUS (custodian for another person)
- EWO (either may draw)
- EXC or EXE (estate executor/executrix)
- GUD (guardianship)
- JTN (joint tenancy)
- JWO (joint without right)
- POA (power of attorney)
- LTE (trustee of a living trust)
- RPE (representative payee)
- SIG (signer)
- SOL (sole owner)
- TRU (trustee)

Step 5

Is the customer-to-account (CUAC) relationship code eligible for the wire transfer?

Yes Continue to step 6.

No Inform the client that you cannot process the wire transfer request due to his/her/their to the account.
You have completed this procedure.

Step 6

Is the Teller21 system online?

Important: Clients that do not use their card and PIN for authentication when requesting wires or if they are from out of state and are requesting a wire for ANY amount, must follow the step-1 authentication (<https://e-manuals.keybank.com:8443/eman/1Admin/KnowYourCustomer/IdentityVerification/Branch/Step1> procedure).

Yes

Using Teller21, perform wire authentication ([./././././kc/teller21/Authenticate/WireAuthentication.htm](https://e-manuals.keybank.com:8443/eman/1Admin/KnowYourCustomer/IdentityVerification/Branch/Step1)). When doing so, if you aut client by search (instead of by swiping an ATM or Debit card):

- a. Collect two forms of identification from the client. For a list of valid primary and see Accepting and Examining Client Identification ([./././././1Admin/KnowYourCustomer/IdentityVerification/Branch/Identification.htm](https://e-manuals.keybank.com:8443/eman/1Admin/KnowYourCustomer/IdentityVerification/Branch/Identification.htm)

Note: The Teller21 receipt includes how you authenticated the client. If the m Multiple ID Authentication completed. "Consult teller for additional details" appears, you n complete due diligence to ensure you verify the client's identity. You may be n complete additional maintenance to correct the information.

- b. Using Intellicheck, verify the authenticity of the client's identification ([./././././1Admin/KnowYourCustomer/IdentityVerification/Branch/Identification.htm](https://e-manuals.keybank.com:8443/eman/1Admin/KnowYourCustomer/IdentityVerification/Branch/Identification.htm) appropriate government identification.

Continue to step 7.

No

Complete the Teller21 Offline Wire Authentication form ([./././././FormsSite/Images/W/WireOfflineAuth.doc](https://e-manuals.keybank.com:8443/eman/1Admin/KnowYourCustomer/IdentityVerification/Branch/Identification.htm)) to authenticate the client.

Continue to step 7.

Step 7

Did you successfully authenticate the client?

Yes

Continue to step 8.

No

You cannot continue with the transaction.

Important: if you identified any red flags, continue to Handling a Suspicious Wire ([./././Security/Branch/raSuspiciousWire.htm](https://e-manuals.keybank.com:8443/eman/1Admin/Security/Branch/raSuspiciousWire.htm)).

You have completed this procedure.

Step 8

Determine your next step.

If you authenticated the client	Do this
By swiping an ATM or debit card	Continue to step 9.
By name, TIN, account number, or card number search	If using a government ID, stamp the back of the Teller21 receipt to you completed the Intellicheck process and the client passed the search Continue to step 9.

Step 9

Is the client making the request when Quest is unavailable?

Yes	Continue to Initiating an Outgoing Wire Transfer Request for Tax Payments or When C Unavailable (rainitiateOutWireTaxNoQuest.htm). You have completed this procedure.
No	Continue to Initiating an Outgoing Wire Transfer (rainitiateOutgoingWire.htm). You have completed this procedure.

KeyPro

Branch ▼



Tools ▼

Products

Services

Administration

System Instructions

What information are you looking for?



Search Tips

Services / Wire Transfers

Security

Revision History

Handle Compromised Confidential I...

Handle Suspicious Wires

Identify Red Flags

Appendix

Rules

Guidelines

Additional

Identifying Red Flags

This page contains information for branch employees to use to identify unusual or suspicious activities (known as red flags) related to wire transfers. Do not use these criteria for the sole purpose of rejection of a wire without further research conducted in relation to the red flag rules.

Important: Wire transfers require strict security. By identifying unusual or suspicious activities and knowing your clients, you can help prevent wire transfer fraud. Review the Rules and Guidelines in the Appendix on this page for wire transfers security requirements and guidelines.

When accepting or processing wire transfer requests, use the following information to identify red flags:

- the client pays for the wire transfer using any of the following:
 - multiple checks, including cashier's checks from other financial institutions
 - withdrawals from several checking accounts
 - an incoming wire posting the same day
 - a new account (open 60 days or less)
 - cash for a large wire from account(s) that carry a small average balance
 - recent deposits, which include checks that may take longer to clear

Example: Canadian or other foreign checks

- the client asks for account balances
- the client asks to change his/her/their phone number, address, or other pedigree information at the time of the request
- recent changes to the client's phone number, address, or email followed by immediate attempts to transact from the account

Note: If system notes indicate recent changes to the client's phone number, address, or email, you should contact him/her/them (using prior contact information) to determine if s/he/they authorized the changes.

- the client claims that they do not have identification or required documentation with him/her/them and will provide it on a later date, typically after you submit the wire
- the signature(s) on wire transfer request documents appear copied and pasted from another document

- the client requests changes to the wire transfer instructions after you have submitted the original request or has changes that are not minor (amount, location changes to another unrelated country/state)
- large wires in amounts and frequencies that are not consistent with the usual business activities of a known client
- the wire doesn't appear logical based on the client's prior history (dollar amount, location, purpose)
- signs that a client may be the victim of a scam or some type of exploitation, such as elder abuse
- the client appears to be wire stripping
- a business client is wiring the funds to an unrelated private individual overseas
- the client is sending multiple out-of-pattern wires to the same beneficiary within a short time period
- the client indicates in an email that they are unavailable for callback verification (funeral, hospital, vacation, family emergency, meetings all day, etc.)
- the client calls/emails excessively regarding the status of the wire transfer
- the client sent a not-in-person wire request via:
 - phone, fax, or mail where s/he/they provided a contact phone number that doesn't match the phone number documented on the account and/or client profile in CE Desktop
 - an email with any of the following:
 - spelling and grammatical errors
 - time differences within the email string that indicates s/he/they may not be emailing from the correct time zone
 - the email string shows that s/he/they forwarded emails from a business email address to a non-related personal email address

Important: There may be other information or activity that is unusual or suspicious with potential for fraud, money laundering, or the financing of terrorism. Although there may be a reasonable explanation for any of these red flag conditions, you should use the examples to detect perpetrators of fraud, money laundering, or the financing of terrorism, each a referable activity under the KeyCorp Suspicious Activity Referral and Reporting Procedure.

Appendix

Rules

Guidelines

Additions

Related to:

Anti-Money Laundering Act

Bank Secrecy Act

Q

Search Tips

Services / Wire Transfers

Outgoing Wire Transfers

Accept Cash for Outgoing Wires

Approve Wire Transfer Requests

Consumer International Wire Trans...

Consumer International Wire Trans...

Early Release of Large Wire Trans...

Identify Clients Requesting Wires

Initiate Outgoing \$5 M for BB/Mid...

Initiate Outgoing Wire Transfers

Initiate Request for Tax Payment ...

Initiate Same-Day Wire Transfers

Not In-Person Outgoing Wire Excep...

Timeframes for Processing Request...

Initiating an Outgoing Wire Transfer

This page contains the procedure for branch employees with the proper authority to use when initiating a wire transfer from a retail client or a wire that is less than \$5 million from a non-retail client.

Important: To minimize the risks associated with outgoing wire transfers, you must identify red (../Security/Branch/security.htm) related to wire transfers and follow the Rules located in the A procedure.

[View All](#)

Step-by-Step

Step 1

Is the amount of the wire \$5 million or greater?

Yes

Using Own Your Day (OYD):

- a. Search for the client (\\fs1\apps\Instructions\OwnYourDay\Search\search.htm).
- b. From the Client Summary screen, select **CE Profile** to identify the coverage team business (LOB).

The Intelligent Profile will display the owning LOB.

Continue to step 2.

No

Continue to step 3.

Step 2

Determine your next step.

If the owning LOB is	Do this
1. A table	1. Drop the table
2. A view	2. Drop the view
3. A synonym	3. Drop the synonym
4. A sequence	4. Drop the sequence
5. A trigger	5. Drop the trigger
6. A procedure, function, package, or package body	6. Drop the object
7. A type	7. Drop the type
8. A tablespace	8. Drop the tablespace
9. A user	9. Drop the user
10. A role	10. Drop the role
11. A database link	11. Drop the database link
12. A constraint	12. Drop the constraint
13. A materialized view	13. Drop the materialized view
14. A partition	14. Drop the partition
15. A table partition	15. Drop the table partition
16. A tablespace partition	16. Drop the tablespace partition
17. A tablespace partition	17. Drop the tablespace partition
18. A tablespace partition	18. Drop the tablespace partition
19. A tablespace partition	19. Drop the tablespace partition
20. A tablespace partition	20. Drop the tablespace partition
21. A tablespace partition	21. Drop the tablespace partition
22. A tablespace partition	22. Drop the tablespace partition
23. A tablespace partition	23. Drop the tablespace partition
24. A tablespace partition	24. Drop the tablespace partition
25. A tablespace partition	25. Drop the tablespace partition
26. A tablespace partition	26. Drop the tablespace partition
27. A tablespace partition	27. Drop the tablespace partition
28. A tablespace partition	28. Drop the tablespace partition
29. A tablespace partition	29. Drop the tablespace partition
30. A tablespace partition	30. Drop the tablespace partition
31. A tablespace partition	31. Drop the tablespace partition
32. A tablespace partition	32. Drop the tablespace partition
33. A tablespace partition	33. Drop the tablespace partition
34. A tablespace partition	34. Drop the tablespace partition
35. A tablespace partition	35. Drop the tablespace partition
36. A tablespace partition	36. Drop the tablespace partition
37. A tablespace partition	37. Drop the tablespace partition
38. A tablespace partition	38. Drop the tablespace partition
39. A tablespace partition	39. Drop the tablespace partition
40. A tablespace partition	40. Drop the tablespace partition
41. A tablespace partition	41. Drop the tablespace partition
42. A tablespace partition	42. Drop the tablespace partition
43. A tablespace partition	43. Drop the tablespace partition
44. A tablespace partition	44. Drop the tablespace partition
45. A tablespace partition	45. Drop the tablespace partition
46. A tablespace partition	46. Drop the tablespace partition
47. A tablespace partition	47. Drop the tablespace partition
48. A tablespace partition	48. Drop the tablespace partition
49. A tablespace partition	49. Drop the tablespace partition
50. A tablespace partition	50. Drop the tablespace partition
51. A tablespace partition	51. Drop the tablespace partition
52. A tablespace partition	52. Drop the tablespace partition
53. A tablespace partition	53. Drop the tablespace partition
54. A tablespace partition	54. Drop the tablespace partition
55. A tablespace partition	55. Drop the tablespace partition
56. A tablespace partition	56. Drop the tablespace partition
57. A tablespace partition	57. Drop the tablespace partition
58. A tablespace partition	58. Drop the tablespace partition
59. A tablespace partition	59. Drop the tablespace partition
60. A tablespace partition	60. Drop the tablespace partition
61. A tablespace partition	61. Drop the tablespace partition
62. A tablespace partition	62. Drop the tablespace partition
63. A tablespace partition	63. Drop the tablespace partition
64. A tablespace partition	64. Drop the tablespace partition
65. A tablespace partition	65. Drop the tablespace partition
66. A tablespace partition	66. Drop the tablespace partition
67. A tablespace partition	67. Drop the tablespace partition
68. A tablespace partition	68. Drop the tablespace partition
69. A tablespace partition	69. Drop the tablespace partition
70. A tablespace partition	70. Drop the tablespace partition
71. A tablespace partition	71. Drop the tablespace partition
72. A tablespace partition	72. Drop the tablespace partition
73. A tablespace partition	73. Drop the tablespace partition
74. A tablespace partition	74. Drop the tablespace partition
75. A tablespace partition	75. Drop the tablespace partition
76. A tablespace partition	76. Drop the tablespace partition
77. A tablespace partition	77. Drop the tablespace partition
78. A tablespace partition	78. Drop the tablespace partition
79. A tablespace partition	79. Drop the tablespace partition
80. A tablespace partition	80. Drop the tablespace partition
81. A tablespace partition	81. Drop the tablespace partition
82. A tablespace partition	82. Drop the tablespace partition
83. A tablespace partition	83. Drop the tablespace partition
84. A tablespace partition	84. Drop the tablespace partition
85. A tablespace partition	85. Drop the tablespace partition
86. A tablespace partition	86. Drop the tablespace partition
87. A tablespace partition	87. Drop the tablespace partition
88. A tablespace partition	88. Drop the tablespace partition
89. A tablespace partition	89. Drop the tablespace partition
90. A tablespace partition	90. Drop the tablespace partition
91. A tablespace partition	91. Drop the tablespace partition
92. A tablespace partition	92. Drop the tablespace partition
93. A tablespace partition	93. Drop the tablespace partition
94. A tablespace partition	94. Drop the tablespace partition
95. A tablespace partition	95. Drop the tablespace partition
96. A tablespace partition	96. Drop the tablespace partition
97. A tablespace partition	97. Drop the tablespace partition
98. A tablespace partition	98. Drop the tablespace partition
99. A tablespace partition	99. Drop the tablespace partition
100. A tablespace partition	100. Drop the tablespace partition

Retail

Continue to step 3.

Business Banking	Continue to In Person Wires \$5 Million or more for Business Banking and Banking/Middle Market Clients (Initiate5MillionMoreBBComm.htm) proceed
or	You have completed this procedure.
Commercial Banking/Middle Market	
All other non-retail LOBs	Refer the client to his/her/their primary officer or relationship manager (RM) You have completed this procedure.

Step 3

Identify the client (raIdentifyClientsRequestingOutgoingWires.htm).

Important:

- Before continuing with this procedure, you must fully identify and authenticate the client in (/eman/kc/kteller21/Authenticate/WireAuthentication.htm). If necessary, you may also use verify further the authenticity of the client's driver's license or government-issued identifies authentication process.
- The Teller21 receipt includes how you authenticated the client. If the message Multiple ID completed. "**Consult teller for additional details**" appears; you must complete due ensure you verify the client's identity. You may be required to complete additional maintain information.

Step 4

Advise the client:

- of any fees (../FeesWaivers/Branch/fees.htm) associated with the wire;
- that the Wire Transfer Department cannot guarantee delivery of the funds to the beneficiary;
- If the wire is in foreign currency and the receiving institution returns it, it may be less than the

Step 5

Determine your next step.

If	Do this
The Wire Transfer Department is debiting the client's account	<p>a. Using Hogan, access the Average Balance History (DDM compare the 12-month average balance to the current balance; additional due diligence is needed).</p> <p>b. Using OLDS, perform an inquiry to verify that no holds, stops, that would prevent the account from being debited to pay for it.</p> <p>c. Using Quest, access the Client Profile Account List panel Date of the debiting account.</p> <p>Continue to step 6.</p>
The client is presenting an on-us check or cash	<p>Accept the cash for the wire transfer (AcceptCash.htm).</p> <p>Continue to step 8.</p>

Step 6

Has the debiting account been open for 60 days or less?

Yes

Generally, KeyBank doesn't initiate wire transfers from new accounts regardless of how long has been with Key. To make an exception to wire funds from a new account, you must have the approval of your experience leader (EL), market experience leader (MEL), regional experience leader (REL), or regional retail leader/territory executive (RRL/RTE) (SameDayNewAcct.htm) as an approver in Quest. Leadership should refer to Approving Wire Transfer Requests (/eman/13services/Wires/Outgoing/Branch/raApprovingWireTransferRequest) for decision approval.

Note: Due to system constraints, you cannot initiate wire transfers from a new account the day the client opens it.

Continue to step 7.

No

Continue to step 7.

Step 7

Are sufficient funds available to process the outgoing wire?

Yes

Continue to step 8.

No

You have completed this procedure.

Step 8

Is the client a power of attorney (POA)?

Yes

Continue to step 9.

No

Continue to step 11.

Step 9

Determine your next step.

If the POA is submitting a wire to

and

Then

Himself/herself/themself

It is the POA's first wire request

a. Submit the POA documentation to A: Document Review (ABDR) (\\...\\LegalSrvcs\\ABDR\\Branch\\RA) to confirm that the POA has authority himself/herself/themself.

Note: This review can take up to 1 complete.

b. Once ABDR provides you with an answer, continue to the next step.

Continue to step 10.

The POA has submitted a wire to himself/herself/himself before

- a. Using Quest, access the Client Profile ([././././kc/quest/CustProfile/CustPr](#) the Recent Service Requests-Q
- b. Locate the last wire transfer service i submitted to himself.
- c. Note the service request reference n the wire transfer service request.

Continue to step 11.

A third-party

n/a

Continue to step 11.

Step 10

Did ABDR confirm that the POA has the authority to wire the funds to himself/herself/himself?

Yes Note the reference number ABDR provided.
Continue to step 11.

No You cannot submit a wire transfer for the POA.
You have completed this procedure.

Step 11

Identify any red flags ([./././Security/Branch/security.htm](#)) that might prevent you from sending the w

Step 12

Did you identify any red flags?

Yes Decide if you can process the outgoing wire ([./././Security/Branch/raSuspiciousWire.ht](#)
You have completed this procedure.

No Continue to step 13.

Step 13

Verify that you can process the request within the established timeframe ([times.htm#When](#)).

Important: You cannot process a wire transfer outside of the established timeframe.

Step 14

Is the client paying for the wire transfer with cash?

Note: If the cash transaction is more than \$10,000, you must complete the Currency Transactio ([././././1Admin/Compliance/BSA/Branch/CTRReport.htm#how](#)).

Yes Accept the cash for the wire transfer ([AcceptCash.htm](#)).
Continue to step 15.

No Continue to step 15.

Step 15

Using Own Your Day (OYD):

- a. Search for the client ([././././SysInstructions/OwnYourDay/Search/search.htm](#)).
- b. From the Client Summary screen, request Transaction Maintenance and Research service ([././././SysInstructions/OwnYourDay/ServicePortal/requestservice.htm](#)). When doing so, select Maintenance and Research | Transfer Refunds | Send a Wire Transfer | Service In Quest.
- c. Submit a Wire Transfer service request ([././././kc/quest/Servicing/Wire.htm](#)). When doing so:
 - For Booked Wires (internal wires or book transfers within KeyBank), follow the instructions for Domestic Wire Transfer, selecting Beneficiary in the Wire Transfer Type field.
 - If you are debiting the funds from a general ledger account, you must obtain approval from an experience leader (EL), market experience leader (MEL), regional experience leader (REL), or regional retail leader/territory executive (RRL/RTE), and s/he/they must sign the request.

Step 16

Did Quest prompt you to select an approver?

Yes

Select an approver for the wire with the appropriate wire transfer authorization limit.

Note: Use Microsoft Teams Chat or call the approver to ensure s/he/they is available immediately.

Continue to step 17.

No

The wire automatically routes to the back-office queue for review and approval. The branch contact the requestor to review the wire information and/or request additional identification. Continue to step 18.

Step 17

Is the selected approver for the wire transfer present at the branch?

Note: If the wire transfer is for \$5 million or more, once the approver with proper limits approves the request, it will route to Wire Operations to update Funds Movement Policy (<https://keynet.keybank.com/kncontent.nsf/0/8DB826730DE59D1A85257D71005F48D9.html>).

Yes

a. Present the signed KeyBank Beneficiary Wire Transfer form to the approver for approval.

Important: When completing the Approver Information section in Quest, it should verify the Identification information is reasonable.

Example: The Identification doesn't contain all zeros or Xs.

b. Answer any questions s/he may have about the wire request.

Continue to step 18.

No

a. Fax or email a copy of the signed KeyBank Beneficiary Wire Transfer form to the review and approval.

Important: When completing the Approver Information section in Quest, it should verify the Identification information is reasonable.

Example: The identification doesn't contain all zeros or Xs.

b. Answer any questions s/he may have about the wire request.

Continue to step 18.

Step 18

In the centralized and secured location designated for wire transfers at your branch, file a copy of:

- KeyBank Beneficiary Wire Transfer Form
- Teller21 authentication receipt
- Prepayment Disclosure Form (consumer international wires only)

Important: To comply with Key's data classification requirements, you must stamp KeyCorp Co outside of the folder where you file the forms. The retention period is five years.

You have completed this procedure.

Related to:

Office of Foreign Assets Control

KeyPro

Branch ▼

Q Tools ▼

Products

Services

Administration

System Instructions

What information are you looking for?

Q

Search Tips

Administration / Compliance / BSA/CTR/MIL

Reporting

Currency Transactions >

International Transportation of C... >

Monetary Instrument Purchases >

Suspicious Activity under the BSA

Reporting Suspicious Activity under the Bank Secrecy

The Bank Secrecy Act (BSA) is the common term for the Currency and Foreign Transactions Reporting of record keeping and reporting requirements designed to identify the movement of large amounts of criminal activity. Failure on the part of any bank, including KeyBank, to comply with the requirements criminal penalties, bad publicity, and loss of business.

Tip: Before handling suspicious activity, read the Guidelines section of this procedure to help you

This page contains the procedure for branch employees to use when handling suspicious activity.

View All

Step-by-Step

Step 1

Determine your first step.

If the suspicious activity is	Do this
Fraud	<p>For example identify theft or check killing.</p> <p>Contact the Fraud Hotline (https://www.keybank.com/ks/contactlist/11st.htm#FraudHotline) or the Tech 3333.</p> <p>You have completed this procedure.</p>
Potential for loss to KeyBank	<p>For example, you have confidential, factual concerns about the deteriorating financial</p> <p>Complete the Suspicious Activity Reporting Form (keyc.00356) (https://forms.office.c?id=5a2KJEEc3kGOoxie4rSBawW4hrpJyVPiBrv8RC5YbpUMUhaWUE1WDJMMVpV) the Other section.</p> <p>You have completed this procedure.</p>
Threat to the safety of people or facilities	<p>For example computer intrusion or civil disturbance.</p> <p>Contact the Event Monitoring Center (EMC) (https://e-manuals.keybank.com/eman/ks/contactlist/clist.htm#CorporateSecurity).</p> <p>You have completed this procedure.</p>

BSA-related activity

For example client refusal to give required information, money laundering schemes or

Important:

- If the person refused to provide proper identification and other necessary information for the transaction.
- You may accept the transaction if the person provides the proper identification and necessary information from KeyBank records before completing the transaction.

Continue to step 2.

Any other, even if carried out by a good or well-known client

Refer suspicious activity immediately to the appropriate party based on the activity id flags) (SuspActivityRedFlags.htm).

Important:

- Do not contact the IRS or law enforcement agencies directly. AML investigation teams are responsible for investigating the suspicious activity and if necessary, contact the appropriate authorities.
- You are responsible for understanding red flags that may arise through the duties including, but not limited to, the examples listed in Types of Suspicious Activity (SuspActivityRedFlags.htm) or on the Financial Crimes Governance (FCG) FCG (https://keynet.keybank.com/knoontent.nsf/0/8D20E22A99C54A388526828E) Compliance Risk site in KeyNet.

You have completed this procedure.

Step 2

Without letting the person know that you are suspicious or that you intend to complete the AML - Suspicious Activity Reporting Form (keyc.00358), complete the transaction requested by the person while obtaining and recording as much information as possible:

- name, address, ID
- physical description of the person and anyone accompanying the person
- description of what was involved in the transaction (for example, denominations of bills, types of instruments)
- description of the vehicle (if any) used by the person

Note: If the transaction calls for the completion of a Currency Transaction Report or a monetary instrument, complete the report or log.

Step 3

After you complete the transaction and the person leaves, photocopy the transaction items.

Step 4

Complete and send the Suspicious Activity Reporting Form (keyc.00356) (https://forms.office.com/Pages/ResponseForm.aspx?id=5a2KjEEc3kGOxle4rSBawW4hrpnJyVPIBrvBRC5YbpUMUhaWUE1WDJMMVpVRzFCN0IYTEHC) (https://intranetg.keybank.com/dom3/public/wat/ksrforms.nsf) as soon as possible.

Important:

- Once you send the form, do not take any further action on the client's account without direct supervision. Due Diligence, such as closing the account or sending a letter to the client.
- The preparation and submission of the AML - Suspicious Activity Reporting Form (keyc.00356) is the responsibility of the employee who discovers the suspicious activity.

Step 5

In addition to the information requested on the form, gather the following information (if possible):

- any available background information
- types of accounts and account numbers
- location of branch where accounts are maintained
- photocopy of Account Express Plan/signature card complete description of the activity involved

Example: To describe a suspicious activity you may write: *A client comes into my branch every Friday to purchase an official bank check with \$5,000 in small denomination bills.*

- account activity, such as types and frequency of transactions

Step 6

Send the additional information you gathered and the photocopies of the transaction items to AML Inv. manuals.keybank.com/eman/kc/kccontactlist/alist.htm#AML).

You have completed this procedure.

Related to:

Bank Secrecy Act

Types of Suspicious Activity and Red Flags

Click the X in the top right corner to close this window.

In addition to the activities covered specifically by the BSA's large currency transaction reporting requirements and the \$3,000 Log Rule, several types of activities, while not technically illegal, may be associated with criminal activity and therefore can be regarded as suspicious under the BSA.

Three of the most common types of suspicious activity are:

- refusal to give required information
- money laundering schemes
- structuring transactions

While performing regular tasks or through reviews of transactions or reports, one or more unusual or unexpected activities or circumstances may be noted, these are known as red flags. Red Flags may point to reportable activities occurring within or throughout Key. Examples of unusual or unexpected activities are listed in the following resources:

- A list of suspicious activity red flags can be found in Attachment 2 of the Corporate SAR procedures found on the Financial Crimes Governance (FCG) Policies and Procedures page on the Compliance Risk site in KeyNet.
- The Identity Theft Prevention Program and the Identity Theft Red Flags are maintained on the Operational Risk Policy page on KeyNet.

HP Color LaserJet MFP M283cdw

Fax Confirmation

27-Feb-2023 6:12PM

Job	Date	Time	Type	Identification	Duration	Pages	Result
252	27/ 2/2023	6:07:07PM	Receive	253-445-5670	4:57	22	OK

Feb/27/2023 5:14:52 PM

Key Bank 253-445-5670

1/22

KeyPro | Branch ▾

Q Tools ▾

Products Services Administration System Instructions

What information are you looking for?

Q

Search Tips

Services / Wire Transfers

Outgoing Wire Transfers

Revision History

Accept Cash for Outgoing Wires

Approve Wire Transfer Requests

Consumer International Wire Trans...

Consumer International Wire Trans...

Early Release of Large Wire Trans...

Identify Clients Requesting Wires

Initiate Outgoing \$5 M for BB/Mid...

Initiate Outgoing Wire Transfers

Initiate Request for Tax Payment ...

Initiate Same-Day Wire Transfers

Not In-Person Outgoing Wire Excep...

Timeframes for Processing Request...

Approving Wire Transfer Requests

This page contains the procedure for branch employees to use when approving a wire transfer request.

Important: Before the Wire Transfer department releases a wire, you must approve the wire request in Quest.

View All

Step-by-Step

Step 1

Review the completed, signed KeyBank Beneficiary Wire Transfer form provided by the initiator for the following:

- dollar amount
- 7-digit operational cost center number
- send date of the wire
- beneficiary information
- signatures of the client and initiating employee

Step 2

Using Hogan, access the Average Balance History (DDMU 12) screen to compare the 12-month average balance to the current balance to determine if additional due diligence is needed.

Step 3

Using CLDS, perform an inquiry to verify that no holds, stops or restraints exist that would prevent the account from being debited to pay for the wire.

Step 4

Using Quest, access the Client Profile | Account List panel to view the Open Date of the debiting account to determine if the account is new (open 60 days or less).